

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20024**

In the Matter of)	
)	
Second Further Notice)	
of Proposed Rule-making)	
)	
Revitalization of the AM Service)	
)	MB Docket 13-249
)	FCC 18-139
)	

To: The Commission:

COMMENTS

Comes now Charles M. Anderson, licensee of broadcast stations and translators and broadcast engineering consultant with comments regarding the the Commission's Second Further Notice of Proposed Rule-making in MB Docket No. 13-249.

Class A station protections:

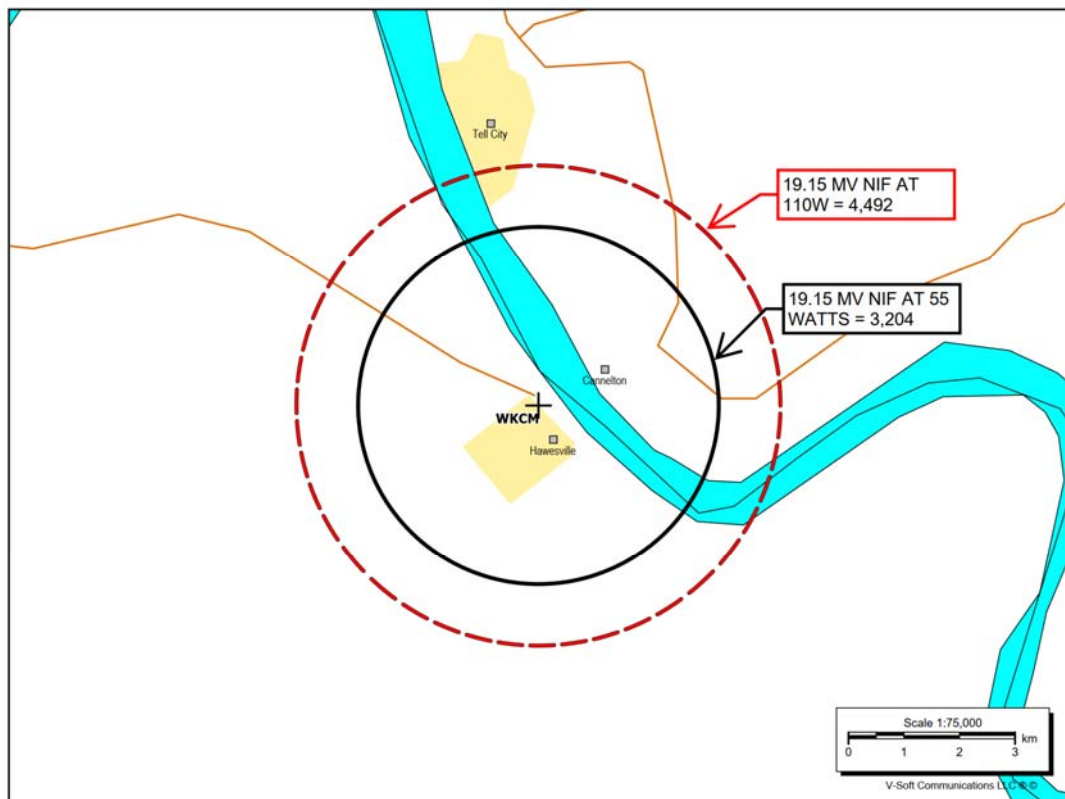
A. We support changing the daytime class A protection to the 0.5 mV/m ground wave. There is general agreement among AM radio experts that the useful AM service contour has been raised to about 2 mV/m by an ever growing number of electrical interference sources. As a result, protection of class A daytime signals to the 0.1 mV/m contour is no longer justifiable nor is it an efficient use of the spectrum. However, we believe the class A stations should continue to enjoy protection to their 0.5 mV/m contours during the day with a 0 dB ratio for adjacent channels, a 25 mV/m to 25 mV/m relationship for 2nd adjacent channels and no protection for the 3rd adjacent channels. This will continue to preserve any useful ground wave coverage they may have for emergency purposes.

B. The Commission should eliminate critical hours protections for class A stations implementing alternative #1.

C. Alternative #1 should be implemented for night-time protection based on the single station method. By eliminating the protection of the 0.5 mV/m sky wave, a number of stations can improve their night facilities.

For example, WQZQ in Goodlettsville, TN can obtain 36 Watts of night service while it is now limited to perhaps 1 Watt if that.

WKCM on 1160 kHz at Hawesville, KY could increase its secondary, non-directional night power from 55 Watts to 110 Watts.



Proposed day interference ratios and night 50% RSS proposals should be adopted:

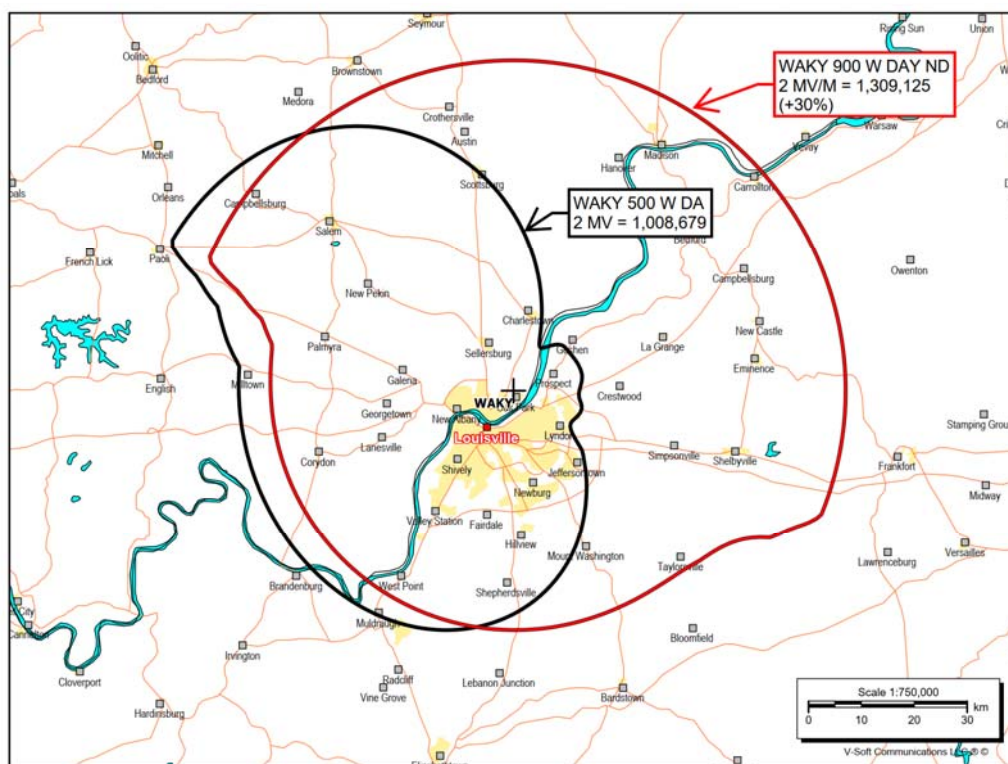
As stated earlier, the majority of industry experts agree that the noise limited daytime contour for AM is now 2 mV/m. Our experience confirms that position and we restate our support for the Commission's proposal to change the day protected contour for class B, C and D stations to 2 mV/m using the current 20 to 1 ratio. Adjacent channel protection should also be changed to 0 dB or 2 mV/m to 2 mV/m. The 1991 change to 0.25 mV/m to 0.5 mV/m for adjacent channels created many new overlaps which have often made it very difficult if not impossible to move or improve facilities. The proposed change for 2nd adjacent channel protection to 25 mV/m to 25 mV/m is also supported along with the elimination of 3rd adjacent channel protection which is entirely justified given the current occupied bandwidth. Making these changes will permit many stations including marginal urban AM stations to significantly improve their facilities overcoming noise and increased attenuation resulting from urbanization.

Every station we studied was able to increase day time power. It seems entirely logical to implement these changes since stations electing not to increase power will still be protected to their currently noise limited 2 mV/m contours. In effect, they will not suffer any loss of service. These are the facilities we analyzed using V-Soft's AMPRO2 based on the proposed protection criteria.

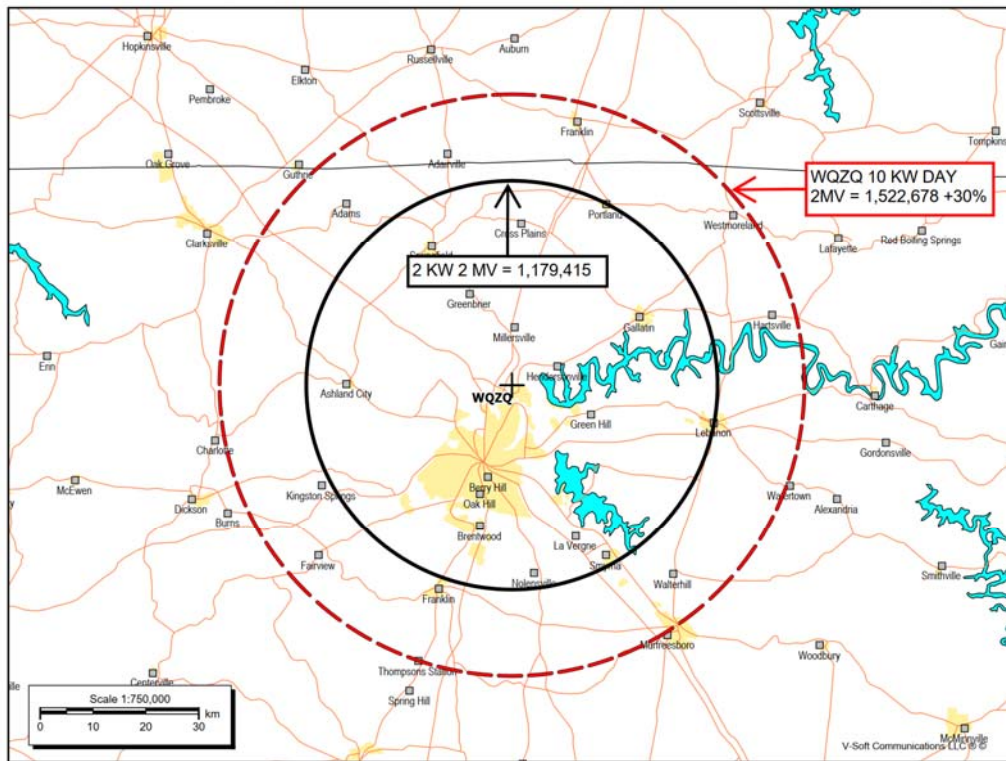
WOL on 1450 kHz in Washington, DC could increase power at site from 0.37 kW to 1 kW with a 429,920 (34.8%) increase in its 2 mV/m population.

WVJS on 1420 kHz in Owensboro, KY can increase from 0.98 kW day to 4.5 kW day with a 181,160 (+121%) increase in 2 mV/m population.

WAKY on 620 kHz in Louisville employs a three tower directional day time array with its incumbent maintenance expense. Implementation of the proposed changes would permit it to change to a non-directional, less expensive operation at 900 Watts while gaining 300,446 in 2 mV/m day population better covering the market to the east.



WQZQ on 830 kHz in Goodlettsville, TN could increase from 2 kW to 10 kW with a 2 mV/m increase of 308,602 (28.6%) and dramatically increase its penetration of a very noisy urban environment. This analysis also used existing field intensity measurements from adjacent channel WHAS on 840 kHz.



WFKN on 1220 kHz in Franklin, KY is the only station in that community of 8,408 and county of 17,327. It could increase its day time power from 250 Watts to 5 kW. Even at 1 kW, the 2 mV/m day contour would increase by 37,210 (+176%) encompassing the entire county.

Night 50% exclusion:

Adopting the 50% RSS exclusion proposal would afford relief for secondary night stations whose power has been established since the adoption of the 25% rule and afford greater flexibility for changes in class B stations' night facilities.

WFKN on 1220 kHz at Franklin, KY which would be able to increase its night power from 90 Watts to 250 Watts non-directional achieving significant improvement in night service to its entire community of 8,408.

Our conclusion is that this proposal should be adopted since it will provide significant night time relief.

Other matters:

AM frequency minor changes:

AM stations should be permitted to change to any frequency as a minor change. FM stations are now permitted to change to any non-reserved frequency at the same class as a minor change. This same flexibility should be afforded to AM stations since the need for new AM stations in a future major change window seems unlikely. Modification to more favorable frequencies as minor changes is an economical means of using existing spectrum as opposed to a window which would undoubtedly create a flood of applications and conflicts resulting in long delays such as those experienced in the 2003 window.

FM translator minor changes:

The Commission should act immediately on the pending NPRM which will permit non-adjacent channel changes for translators to resolve caused or received interference. This could save substantial Commission and broadcasters resources now consumed by “interference battles”.

January 30, 2019

A handwritten signature in blue ink, reading "Charles M. Anderson", written over a horizontal line.

Charles M. Anderson
1519 Euclid Avenue
Bowling Green, KY 42103